

EXHIBIT A

1. Admit COI
2. Bar post-conviction prosecutor as irrelevant
3. Bar trial/felony review prosecutor opinions on probable cause, guilt, other legal issues
4. Admit party admissions (from Halvorsen/other deceased defendants)
5. Bar Plaintiff's other bad acts (convictions, arrest, prison disciplinary record, etc.)
6. Exclude third-party witnesses' other bad acts (includes: illegal drugs, arrests, convictions, street gangs, prison discipline)
7. Bar undisclosed experts; bar 26(a)(2)(C) additional opinions; bar expert opinions from lay witnesses
8. Bar reference to street gangs
9. Bar reasonable diligence defense
Instruct jury regarding appropriate standard
10. Bar reference to ability to pay (or admit evidence of insurance and indemnification)
11. The parties will not appeal to jurors' pecuniary interests or interests as taxpayers
12. Non-party witnesses will be barred from the courtroom during trial.
13. The parties will not reference claims no longer in the case or refer to claims against dismissed defendants
14. Defendants will not present evidence of their awards or commendations
15. Defendants will not wear their uniforms to the trial
16. The parties will not present evidence relating to settlement discussions
17. Bar tag team cross-examination
18. The parties will not discuss fact witnesses being paid witness fees
19. Bar criminal trial transcripts
20. Bar criminal background checks during voir dire
21. Bar/Limit Opinions of Rider (gang expert)
22. Bar/Limit Opinions of Muich (police practices)
23. Bar/Limit Opinions of Murray (street files re Brasfield)
24. Bar/Limit Opinions of Wixted (eyewitness ID)
25. Preclusion on Street Files Theory